

177236

ELLIOTT & ELLIOTT, P.A.
ATTORNEYS AT LAW
721 OLIVE STREET
COLUMBIA, SOUTH CAROLINA 29205
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555
FACSIMILE (803) 771-8010


December 22, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

RE: South Carolina Electric & Gas Company Annual Review of Base Rates for Fuel Costs
Docket No. 2006-2-E

Dear Mr. Terreni:

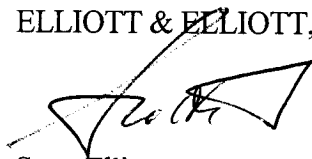
Enclosed please find for filing an original and one (1) copy of the South Carolina Energy Users Committee's First Set of Interrogatories to SCE&G and First Set of Request to Produce to SCE&G, together with a Certificate of Service in the above-captioned matter.

I have enclosed an extra copy of these Interrogatories and Request to produce which I would ask you to date stamp and return to me in the self-addressed, stamped envelope provided for your convenience. By copy of this letter, I am serving all parties of record. 

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

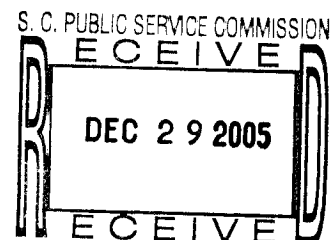
Sincerely,

ELLIOTT & ELLIOTT, P.A.

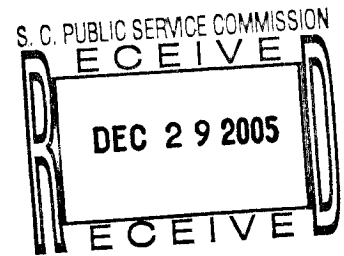

Scott Elliott

SE/mlw

cc: Parties of record w/enclosures



STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2006-2-E



IN THE MATTER OF:)	
)	
South Carolina Electric & Gas Company)	SCEUC'S FIRST SET OF
Annual Review of Base rate for Fuel Costs)	INTERROGATORIES
		TO SCE&G

TO: SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ITS ATTORNEY,
PATRICIA B. MORRISON, ESQUIRE, MITCHELL M. WILLOUGHBY, ESQUIRE,
& BELTON T. ZEIGLER, ESQUIRE

In accordance with S.C. Code Ann. Regs. R.103-851, and R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC" or "Intervenor") requests the Applicant, South Carolina Electric & Gas Company ("SCE&G") answer the following interrogatories within ten (10) days from the date of service, under oath, through the individual officers, managing agents, employees, members or representatives who are most knowledgeable with respect to the subject to which each respective interrogatory is addressed.

INSTRUCTIONS

The Intervenor requests SCE&G to serve its responses upon the Intervenor's undersigned counsel not later than ten (10) days after the service hereof. The interrogatories are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses of these interrogatories. The responses to these interrogatories should be provided to the

Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205.

If SCE&G claims a privilege as to any interrogatory, with respect thereto, set forth the following:

1. Who possesses any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bills, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail

files, both current and deleted, and any other computer files of whatever type which are in SCE&G's possession, custody or control.

B. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and this request any documents which might otherwise be construed to be outside its scope.

C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word "you" or "your" means or refers to SCE&G, its agents, consultants, or any member, officer or other representative of SCE&G.

E. As used herein, the word "identify" means provision of dates, times, places, and parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

INTERROGATORIES

SCEUC 1-1. Please provide all forecasted costs of natural gas, fuel oil, coal and nuclear costs to be relied upon by Applicant in calculating the fuel factor. Please provide all bases for these forecasts.

SCEUC 1-2. Please provide all costs incurred in the test year to date for natural gas, fuel oil, coal and nuclear costs.

SCEUC 1-3. Please provide monthly generation output figures for the test year to date for all generation plants owned or operated by SCE&G for service to South Carolina consumers.

SCEUC 1-4. Please provide a detailed summary of all purchased power costs incurred by SCE&G in the test year to date. Please be as specific as possible and provide the purchased power costs in terms of capacity costs, fuel costs, transmission costs, etc.

SCEUC 1-5. Please provide a forecast of the expected fuel factor to be requested by SCE&G at its next annual fuel proceeding based upon SCE&G's historical over/under recovery to date and SCE&G's forecast of prices for natural gas, coal, oil and other fuel required for generation of electricity.

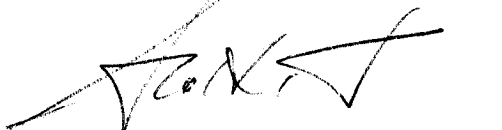
SCEUC 1-6. Please provide a breakdown of any cost increase, both in dollar and percentage terms, for the typical residential, commercial and industrial consumer.

SCEUC 1-7. Please provide a detailed list of all wholesale sales made by SCE&G during test year to date. Please include in this list the MWHs sold to the supplier, and the total cost paid by each supplier. Please specifically list whether any sale was made on a native load priority basis and please state whether the sale of power was based on incremental cost or system average costs. SCEUC does not need to know the names of the suppliers and would prefer that the purchasers be labeled as Buyer A, Buyer B, Buyer C, etc. SCE&G is also free to take whatever other confidentiality measures that it so desires with this request for information.

SCEUC 1-8. Please provide SCE&G's forecasted nuclear fuel usage for each month of the test year to date as well as the forecasted nuclear fuel (\$ per pound) cost for each month.

SCEUC 1-9. Please provide SCE&G's forecasted coal usage (tons) for each month of the test year to date as well as the forecasted coal fuel cost (\$ per ton delivered) for each month.

Elliott & Elliott, P.A.

A handwritten signature in black ink, appearing to read 'S. Elliott', is written over a horizontal line.

Scott Elliott
721 Olive Street
Columbia, SC 29205
803-771-0555 Phone
803-771-8010 Fax

ATTORNEY FOR SOUTH CAROLINA
ENERGY USERS COMMITTEE

Columbia, South Carolina

December 22, 2005

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2006-2-E

IN THE MATTER OF:)	
)	
South Carolina Electric & Gas Company)	SCEUC'S FIRST SET OF
Annual Review of Base rate for Fuel Costs)	REQUEST TO PRODUCE
		TO SCE&G

TO: SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ITS ATTORNEY,
PATRICIA B. MORRISON, ESQUIRE, MITCHELL M. WILLOUGHBY, ESQUIRE, &
BELTON T. ZEIGLER, ESQUIRE:

INSTRUCTIONS

In accordance with S.C. Code Ann. Reg. R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC" or "Intervenor") requests the Applicant, South Carolina Electric & Gas Company ("SCE&G") produce the following documents within ten (10) days after the service hereof. The requests are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses to this request to produce. With respect to the production of documents, the requested documents should be provided to the Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205, or at such other locations as is mutually agreeable to SCE&G and the Intervenor. The documents will be promptly returned after reproduction (if required).

If SCE&G claims a privilege as to any request for production, with respect thereto, set forth the following:

1. Who possess any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term “Document” is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bills, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail files, both current and deleted, and any other computer files of whatever type which are in SCE&G’s possession, custody or control.

B. As used herein, the words “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any documents which might otherwise be construed to be outside its scope.

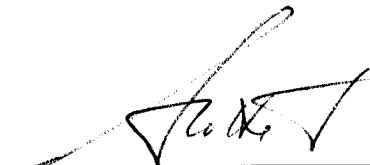
C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word "you" or "your" means or refers to SCE&G, its agents, consultants, or any member, officer or other representative of SCE&G.

As used herein, the word "identify" means provision of dates, times, places, and parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

SCEUC 1-1. Please provide all work papers used to calculate the experience modification factor and forecasted fuel rate.

SCEUC 1-2. Please provide copies of the monthly fuel recovery reports currently filed with the Public Service Commission and/or with the Office of Regulatory Staff since May 1, 2005.



Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205
803-771-0555
803-771-8010

Columbia, South Carolina

December 22, 2005

ATTORNEY FOR SOUTH CAROLINA
ENERGY USERS COMMITTEE

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Electric & Gas Company Annual Review of
Base Rates for Fuel Costs
Docket No. 2006-2-E

PARTIES SERVED: Patricia B. Morrison, Esquire
SCANA Services, Inc.
Legal Department – 130
Columbia, SC 29218


Shannon B. Hudson, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P. O. Box 8416
Columbia, SC 29202

Belton T. Zeigler, Esquire
Haynsworth Sinkler & Boyd, PA
P. O. Box 11889
Columbia, SC 29211

PLEADING: INTERVENOR'S FIRST SET OF INTERROGATORIES
AND DEFENDANT'S FIRST SET OF REQUEST TO
PRODUCE

December 22, 2005


Marcia W. Walters

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2006-2-E

IN THE MATTER OF:)	
)	
South Carolina Electric & Gas Company)	SCEUC'S FIRST SET OF
Annual Review of Base rate for Fuel Costs)	INTERROGATORIES
		TO SCE&G

TO: SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ITS ATTORNEY,
PATRICIA B. MORRISON, ESQUIRE, MITCHELL M. WILLOUGHBY, ESQUIRE,
& BELTON T. ZEIGLER, ESQUIRE

In accordance with S.C. Code Ann. Regs. R.103-851, and R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC" or "Intervenor") requests the Applicant, South Carolina Electric & Gas Company ("SCE&G") answer the following interrogatories within ten (10) days from the date of service, under oath, through the individual officers, managing agents, employees, members or representatives who are most knowledgeable with respect to the subject to which each respective interrogatory is addressed.

INSTRUCTIONS

The Intervenor requests SCE&G to serve its responses upon the Intervenor's undersigned counsel not later than ten (10) days after the service hereof. The interrogatories are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses of these interrogatories. The responses to these interrogatories should be provided to the

Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205.

If SCE&G claims a privilege as to any interrogatory, with respect thereto, set forth the following:

1. Who possesses any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bills, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail

files, both current and deleted, and any other computer files of whatever type which are in SCE&G's possession, custody or control.

B. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and this request any documents which might otherwise be construed to be outside its scope.

C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word "you" or "your" means or refers to SCE&G, its agents, consultants, or any member, officer or other representative of SCE&G.

E. As used herein, the word "identify" means provision of dates, times, places, and parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

INTERROGATORIES

SCEUC 1-1. Please provide all forecasted costs of natural gas, fuel oil, coal and nuclear costs to be relied upon by Applicant in calculating the fuel factor. Please provide all bases for these forecasts.

SCEUC 1-2. Please provide all costs incurred in the test year to date for natural gas, fuel oil, coal and nuclear costs.

SCEUC 1-3. Please provide monthly generation output figures for the test year to date for all generation plants owned or operated by SCE&G for service to South Carolina consumers.

SCEUC 1-4. Please provide a detailed summary of all purchased power costs incurred by SCE&G in the test year to date. Please be as specific as possible and provide the purchased power costs in terms of capacity costs, fuel costs, transmission costs, etc.

SCEUC 1-5. Please provide a forecast of the expected fuel factor to be requested by SCE&G at its next annual fuel proceeding based upon SCE&G's historical over/under recovery to date and SCE&G's forecast of prices for natural gas, coal, oil and other fuel required for generation of electricity.

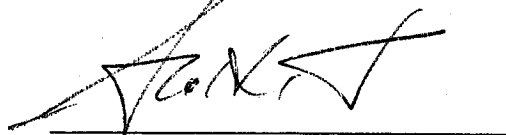
SCEUC 1-6. Please provide a breakdown of any cost increase, both in dollar and percentage terms, for the typical residential, commercial and industrial consumer.

SCEUC 1-7. Please provide a detailed list of all wholesale sales made by SCE&G during test year to date. Please include in this list the MWHs sold to the supplier, and the total cost paid by each supplier. Please specifically list whether any sale was made on a native load priority basis and please state whether the sale of power was based on incremental cost or system average costs. SCEUC does not need to know the names of the suppliers and would prefer that the purchasers be labeled as Buyer A, Buyer B, Buyer C, etc. SCE&G is also free to take whatever other confidentiality measures that it so desires with this request for information.

SCEUC 1-8. Please provide SCE&G's forecasted nuclear fuel usage for each month of the test year to date as well as the forecasted nuclear fuel (\$ per pound) cost for each month.

SCEUC 1-9. Please provide SCE&G's forecasted coal usage (tons) for each month of the test year to date as well as the forecasted coal fuel cost (\$ per ton delivered) for each month.

Elliott & Elliott, P.A.

A handwritten signature in black ink, appearing to read 'S. Elliott', is written over a horizontal line.

Scott Elliott
721 Olive Street
Columbia, SC 29205
803-771-0555 Phone
803-771-8010 Fax

ATTORNEY FOR SOUTH CAROLINA
ENERGY USERS COMMITTEE

Columbia, South Carolina

December 22, 2005

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2006-2-E

IN THE MATTER OF:)

South Carolina Electric & Gas Company)
Annual Review of Base rate for Fuel Costs)

**SCEUC'S FIRST SET OF
REQUEST TO PRODUCE
TO SCE&G**

TO: SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ITS ATTORNEY,
PATRICIA B. MORRISON, ESQUIRE, MITCHELL M. WILLOUGHBY, ESQUIRE, &
BELTON T. ZEIGLER, ESQUIRE:

INSTRUCTIONS

In accordance with S.C. Code Ann. Reg. R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC" or "Intervenor") requests the Applicant, South Carolina Electric & Gas Company ("SCE&G") produce the following documents within ten (10) days after the service hereof. The requests are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses to this request to produce. With respect to the production of documents, the requested documents should be provided to the Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205, or at such other locations as is mutually agreeable to SCE&G and the Intervenor. The documents will be promptly returned after reproduction (if required).

If SCE&G claims a privilege as to any request for production, with respect thereto, set forth the following:

1. Who possess any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bills, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail files, both current and deleted, and any other computer files of whatever type which are in SCE&G's possession, custody or control.

B. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any documents which might otherwise be construed to be outside its scope.

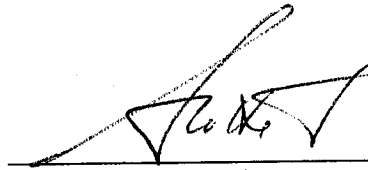
C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word "you" or "your" means or refers to SCE&G, its agents, consultants, or any member, officer or other representative of SCE&G.

As used herein, the word "identify" means provision of dates, times, places, and parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

SCEUC 1-1. Please provide all work papers used to calculate the experience modification factor and forecasted fuel rate.

SCEUC 1-2. Please provide copies of the monthly fuel recovery reports currently filed with the Public Service Commission and/or with the Office of Regulatory Staff since May 1, 2005.



Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205
803-771-0555
803-771-8010

Columbia, South Carolina

December 22, 2005

ATTORNEY FOR SOUTH CAROLINA
ENERGY USERS COMMITTEE

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Electric & Gas Company Annual Review of
Base Rates for Fuel Costs
Docket No. 2006-2-E

PARTIES SERVED: Patricia B. Morrison, Esquire
SCANA Services, Inc.
Legal Department – 130
Columbia, SC 29218


Shannon B. Hudson, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P. O. Box 8416
Columbia, SC 29202

Belton T. Zeigler, Esquire
Haynsworth Sinkler & Boyd, PA
P. O. Box 11889
Columbia, SC 29211

PLEADING: INTERVENOR'S FIRST SET OF INTERROGATORIES
AND DEFENDANT'S FIRST SET OF REQUEST TO
PRODUCE

December 22, 2005


Marcia W. Walters